

How is an EMR performed?

An EMR is performed by a team of experts, who visit a facility to conduct the evaluation. The EMR team examines the facility's environmental documentation to understand how the management system is designed. Then, they interview the facility's personnel to understand how the EMS actually works in practice. Team members next evaluate what they have observed by comparing it to one of the EPA-recognized EMS guidelines. For example, the *Generic Protocol for Conducting Environmental Audits at Federal Facilities* examines seven criteria, which are:

- ◆ Organizational Structure;
- ◆ Environmental Commitment;
- ◆ Formality of Environmental Programs;
- ◆ Internal and External Communications;
- ◆ Staff Resources, Training, and Development;
- ◆ Program Evaluation, Reporting, and Corrective Action; and
- ◆ Environmental Planning and Risk Management.

EPA also recognizes the *Code of Environmental Management Principles* for Federal Agencies (CEMP) and the International Standard (ISO 14001) for Environmental Management Systems.

For information on EMSs and EMRs, please see the following websites:

<http://www.epa.gov/oeca/fedfac/policy/emr43001.pdf>
<http://www.epa.gov/oeca/cemp/cemptoc.html>
<http://www.epa.gov/ems>
<http://www.epa.gov/oeca/fedfac/compliance/natmasar-complete.pdf>
<http://www.epa.gov/oeca/fedfac/fflex.html>

How do I get an EMR performed at my facility?

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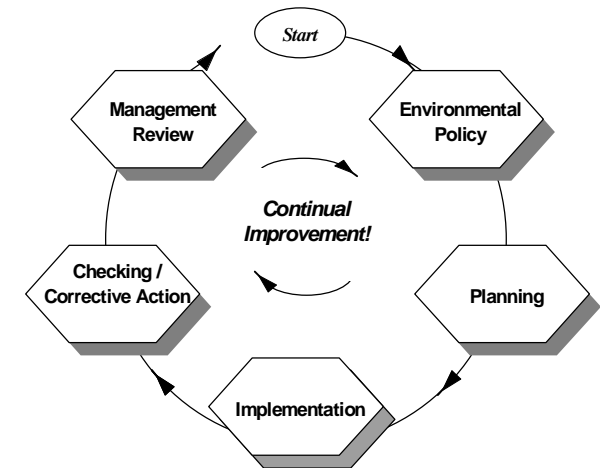
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Environmental Management Reviews at Federal Facilities



U.S. EPA Federal Facilities Enforcement Office

What is an EMS?

An Environmental Management System (EMS) is a system that helps an organization develop, implement, achieve, and maintain a successful environmental policy. All organizations, federal facilities included, have an obligation to preserve the environment and its resources for future generations. An EMS helps facilities meet this responsibility through planning, tracking, and continually improving their environmental performance.

An EMS is designed to increase the efficiency of an organization's processes, increase the effectiveness of its environmental program, and strengthen its environmental credibility with customers, governments, and communities.

What common EMS challenges do federal facilities face?

Staff at federal facilities face a variety of challenges in developing and implementing EMSs at their facilities. Some of these problems include:

- ✓ Lack of adequate environmental staff;
- ✓ Lack of annual training plans and mechanisms to track individual training needs and accomplishments;
- ✓ Lack of clear EMS policies, goals, objectives, and targets;
- ✓ Failure to communicate "lessons learned" to other federal facilities; and
- ✓ Lack of opportunity to gather ideas and feedback from other departments or groups.

What is an EMR?

An Environmental Management Review (EMR) is "a review of an individual facility's program and management systems to determine the extent to which a facility has developed and implemented specific environmental protection programs and plans which, if properly managed, should ensure compliance and progress towards environmental excellence." An EMR is a tool to assist facilities in improving their environmental performance. However, instead of focusing on manufacturing processes, regulatory requirements, or waste streams, the EMR focuses on a facility's environmental management systems.

"Preparation for the review caused us to take a hard look at our compliance to a diverse number of environmental areas. As the Safety Manager, the process was also a useful tool to educate top management concerning an area about which they have very little knowledge or experience. I would recommend the process to any of our Safety Managers in the system."

Facility Safety/Environmental Mgr.

Why would you want to have an EMR done at your facility?

There are many benefits to having an EMR performed at a facility. Several of the most pronounced benefits are:

- ✓ It is a collaborative and inexpensive means to enhance a facility's EMS;
- ✓ An outside party can discover issues overlooked by busy facility staff;
- ✓ EPA's regulatory and technical environmental expertise is made available to the facility;

- ✓ Root causes of problems can be uncovered;
- ✓ It can lead to improved environmental compliance and more efficient and effective environmental management;
- ✓ It provides feedback on the effectiveness of a facility's system, benchmarks the facility's performance, and identifies opportunities for improvement;
- ✓ EPA generally will not conduct inspections at the facility for at least six months after an EMR is done; and
- ✓ For any compliance problems or violations discovered during an EMR, the Incidental Violations Response Policy governs EPA's response.

Which federal agencies have had EPA conduct EMRs at their facilities?

- Bureau of Indian Affairs
- Bureau of Prisons
- Coast Guard
- Department of Agriculture
- Department of Defense (Air Force; Army; Army Corps of Engineers; Army National Guard; Navy)
- Department of Energy
- Department of the Treasury
- Environmental Protection Agency
- Federal Aviation Administration
- Federal Emergency Management Agency
- Fish & Wildlife Service
- National Aeronautics & Space Administration
- National Park Service
- U.S. Postal Service
- U.S. Mint
- Veteran's Health Administration

"The EMR is also a good program to receive a friendly environmental management audit, which ultimately will help the facility's environmental programs succeed."

- Facility Environmental Mgr.